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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SONY CORPORATION,

Plaintiff,

v.

VIZIO, INC.,

Defendant.

CASE NO. CV 08-01135-RGK (FMOx)

DISCOVERY MATTER

**SONY CORPORATION'S
APPLICATION TO FILE UNDER
SEAL (1) THE JOINT STIPULATION
REGARDING ITS MOTION TO
COMPEL A FURTHER RESPONSE
TO SONY'S REQUEST FOR
PRODUCTION NOS. 17-23, 24, 26,
AND 82 AND (2) DECLARATION OF
PETER A. KLIVANS AND EXHIBITS**

Magistrate Judge: Hon. Fernando M. Olguin

Hearing: 10:00 a.m. on September 16, 2009, at
312 N. Spring St., 9th Floor, Courtroom F

Discovery Cut-Off Date: November 1, 2009

Pretrial Conference Date: January 10, 2010

Trial Date: January 26, 2010

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CLERK, U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY *[Signature]*
Proposed Order Lodged

FILED

1 Pursuant to Local Rule 79-5.1, plaintiff Sony Corporation hereby respectfully
2 requests that the Court order filed under seal the following documents:

3 (1) Joint Stipulation Regarding Sony Corporation's Motion to Compel a
4 Further Response to Sony's Request for Production Nos. 17-23, 24, 68 and 82; and

5 (2) Declaration of Peter A. Klivans and Exhibits in Support of Sony
6 Corporation's Motion to Compel a Further Response to Sony's Request for
7 Production Nos. 17-23, 24, 68 and 82.

8 This request is made on the basis that the documents enumerated above
9 include a discussion of information and documents governed by the protective order
10 entered in this action. Accordingly, Sony Corporation respectfully requests that
11 these documents be filed under seal. A public redacted version of the Declaration of
12 Peter A. Klivans will be electronically filed today.

13
14 DATED: August 26, 2009

Respectfully submitted,

15 QUINN EMANUEL URQUHART OLIVER &
16 HEDGES, LLP

17
18 By  FOR
19 Kevin P.B. Johnson
Attorneys for Sony Corporation